

REMARKS

The Office Action mailed November 14, 2006, has been received and the Examiner's comments carefully reviewed. In the present Amendment, claims 1, 14, and 16 are amended. Claims 1-19 remain pending. No new matter has been added, and favorable reconsideration of this application is requested in view of the following remarks.

Claim Rejections - 35 USC § 102

In the Office Action, claims 1, 3-14 and 16-19 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Choy et al. (U.S. Patent No. 5,487,120). Applicant respectfully traverses this rejection.

Applicant notes that each of independent claims 1, 7, 14, and 16 as currently presented recite a specific configuration of electrical to electrical and optical to electrical cards that is neither disclosed or suggested by the prior art. Independent claim 1 requires that the electrical to electrical converters mated with the optical to electrical converters at a card edge connector. Independent claim 7 requires that the “electrical to electrical cards each including a rear interface portion for mating with the electrical interface port”, the electrical interface port found on one of the plurality of optical to electrical cards. Independent claim 14 requires a “main signal to electrical converter card mated with one of the optical to electrical converter cards at a card edge connector”. Independent claim 16 requires “mating an electrical to electrical converter card to a selected one of the optical to electrical converter cards at a card edge connector”. Support for the amendments are found in various places in the specification, such as at page 6 line 27 to page 7 line 1; page 7 lines 21-29; and page 9 lines 5-7. At least these aspects of the independent claims are not disclosed or suggested by the cited art.

Choy et al. does not disclose or suggest direct connection between an electrical to electrical card and an optical to electrical card. Rather, Choy et al. discloses a system in which an Input/Output Card (IOC) is interconnected to a backplane at a location above a Laser Receiver Card (LRC), which is also connected to the backplane. *See* Choy et al., Figure 4. Choy et al. therefore does not disclose a system in which the two types of cards are interconnected.

For at least this reason, Applicant asserts that Choy et al. lacks at least this element of the independent claims.

For at least the above reason, Applicant asserts that Choy et al. does not anticipate independent claims 1, 7, 14, and 16. Applicant respectfully requests reconsideration and withdrawal of the rejection of these claims. Similarly, claims 3-6 depend from independent claim 1, claims 8-13 depend from independent claim 7, and claims 17-18 depend from claim 16. Each of these claims therefore inherit the corresponding limitations of those independent claims and are not anticipated by Choy et al. for at least this reason as well. Applicant therefore respectfully requests reconsideration and withdrawal of the rejection of these claims as well.

Claim Rejections - 35 USC § 103

In the Office Action, claim 2 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Choy et al. (U.S. Patent No. 5,487,120) in view of Ramaswami et al. (U.S. Patent No. 6,571,030). Claim 15 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Choy et al. Applicant respectfully traverses these rejections.

Regarding claim 2, Applicant first notes that Choy et al. teaches away from redundant fiber signals. Choy et al. teaches cost reduction by minimizing the number of components and fiber links incorporated into a system. Specifically, Choy et al. states that “As the number of different types of data communications equipment increases, it can be appreciated that the expense associated with renting additional fiber pairs may become prohibitive.” Therefore, Choy et al. teaches away from use of extra fiber pairs, even for redundancy and error correction.

Secondly, Applicant notes that claim 2 depends from independent claim 1, and inherits all of the limitations therefrom. Therefore, claim 2 requires electrical to electrical converters mated with the optical to electrical converters at a card edge connector. Applicant notes that the combination of Choy et al. and Ramaswami et al. fails to disclose or suggest electrical to electrical converters mated with the optical to electrical converters at a card edge connector. For at least this additional reason, Applicant respectfully requests reconsideration and withdrawal of the rejection of this claim.

Regarding claim 15, Applicant first notes that the Examiner has provided no motivation to use the NRZI format, because there is no indication in Choy et al. itself that the NRZI format would be particularly desirable. See M.P.E.P. § 2143.01. Therefore, use of the NRZI format, in combination with the other limitations as recited in claim 14, is not rendered obvious by Choy et al. Secondly, Applicant notes that claim 15 depends from independent claim 14, and inherits all of the limitations therefrom. Therefore, claim 15 requires "main signal to electrical converter card mated with one of the optical to electrical converter cards at a card edge connector". Applicant notes that Choy et al. fails to disclose or suggest electrical to electrical converters mated with the optical to electrical converters at a card edge connector, as discussed above. For at least these additional reasons, Applicant respectfully requests reconsideration and withdrawal of the rejection of this claim.

Conclusion

It is respectfully submitted that each of the presently pending claims is in condition for allowance and notification to that effect is requested. Although certain arguments regarding patentability are set forth herein, there may be other arguments and reasons why the claimed invention is patentably distinct. Applicant reserves the right to raise these arguments in the future. The Examiner is invited to contact Applicant's representative at the below-listed telephone number if it is believed that the prosecution of this application may be assisted thereby.

Respectfully submitted,

MERCHANT & GOULD P.C.
P.O. Box 2903
Minneapolis, MN 55402-0903
(612) 332-5300

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Steven C. Bruess

Steven C. Bruess
Reg. No. 34,130
SBruess/AJL/dc